



Mr Jamie Merrick  
Director-General  
Department of Environment and Science  
GPO Box 2454  
BRISBANE QUEENSLAND 4001

Email: [jamie.merrick@des.qld.gov.au](mailto:jamie.merrick@des.qld.gov.au)  
[ResourceRecovery@des.qld.gov.au](mailto:ResourceRecovery@des.qld.gov.au)

1 November 2021

Dear Mr Merrick

**Re: Draft Queensland Organics Strategy 2022–2032**

Thank you for the opportunity to provide feedback on the Department of Environment and Science's (DES) draft Queensland Organics Strategy 2022-2032.

The Waste Management and Resource Recovery Association of Australia (WMRR) is the national peak body representing Australia's \$15.5 billion waste and resource recovery (WARR) industry. With more than 2,000 members from over 500 entities nationwide, we represent the breadth and depth of the sector, within business organisations, the three (3) tiers of government, universities, and NGOs.

The WARR industry employs more than 11,800 Queenslanders and contributes \$1.5 billion to the state economy. WMRR's purpose is to lead the continued growth and success of our essential industry in Queensland and around Australia. This includes supporting the transition to more sustainable material management pathways that capture value and create economic opportunities.

WMRR recognises the Department's efforts in improving WARR outcomes in a bid to move away from a take-make-dispose approach towards material use, and welcomes the release of the draft Queensland Organics Strategy, which WMRR notes is seeking to complement Queensland's *Waste Management and Resource Recovery Strategy* (2019) and align with the state's responsibilities to contribute to the objectives of Australia's *National Waste Policy Action Plan*; namely, target six (6) to halve organic waste going to landfill by 2030.

WMRR supports the draft strategy's vision of tackling organics as part of its broader efforts to create a zero waste and circular economy in Queensland; however, the strategy continues to have a linear focus which goes against the principles of a circular economy, including designing out waste (avoidance) in the first instance. In fact, the strategy is at best confusing and at worst, misinformed in articulating that a circular economy is one that keeps waste circulating.

As you may be aware, this issue has been widely discussed by the Stakeholder Advisory Group, which has provided significant feedback on the need to focus on avoidance measures, and how to develop a sustainable and actionable plan to drive the state's organics management goals. Thus, it is disappointing to see that little of the group's feedback has been taken into consideration, given the

**WMRR NATIONAL OFFICE**  
57 ST JOHNS ROAD  
GLEBE NSW 2037

(02) 8746 5000  
[INFO@WMRR.ASN.AU](mailto:INFO@WMRR.ASN.AU)

[WMRR.ASN.AU](http://WMRR.ASN.AU)



absence of this advice in the resultant strategy, which appears to be a high-level document that does not provide practical pathways in which these actions can and will be implemented, funded, tracked, or delivered.

Whilst the paper's stated goal includes promoting material management in line with the waste management hierarchy under which avoidance is preferred, and identifies "priority actions from avoidance through to improved end-use management", the bulk of the actions outlined remain skewed towards promoting end-of-pipe uses for raw and recycled organics rather than focusing on waste prevention in the first instance. For instance, there are actions such as educational campaigns aimed at behavioural change and organic waste avoidance within the strategy but these are light-touch and few compared with the actions focused on landfill diversion via downstream methods; for example, organics processing facilities and research into new markets and uses for these materials. There is also a complete absence of addressing clear regulatory pathways for this material and not aligning this with a statewide education campaign (both avoidance and for beneficial re-use) - all of which are necessary to develop a strong organics system in Queensland as well as a quality output.

There are many missed opportunities within this document, including the lack of clear consideration of the uptake of proven global campaigns, such as WRAP UK's 'Love Food, Hate Waste' program, that would have given Queensland a strong model to follow and would result in tangible avoidance outcomes. The lack of a clear avoidance strategy is of particular concern given that the Queensland government has, of its own volition, linked levy payments to council with material going to landfill; a strong campaign on reducing this amount has many benefits - not just in landfill reduction, but also reduced greenhouse gas emissions and cost to the household. The heavy-handed focus on landfill diversion by all manner of actions obscures the simple fact that significant volumes of organic waste – and especially food waste – are avoidable.

WMRR thus implores the Department to recalibrate the draft strategy to have a stronger focus on avoidance actions in its initial two (2) to five (5)-year timeframes. In accordance, any forward-investments into end-of-pipe solutions, such as organics processing infrastructure, should be informed by the knowledge that these assets will exist in a future with potentially heavily reduced available feedstocks (due to a focus on waste avoidance); as such, these facilities should be planned accordingly.

WMRR's feedback on the four (4) requested key considerations can be found over the page. If you should wish to discuss this feedback in further detail, please do not hesitate to contact the undersigned.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Gayle Sloan'.

Gayle Sloan  
**Chief Executive Officer**  
Waste Management and Resource Recovery Association of Australia

**WMRR NATIONAL OFFICE**  
57 ST JOHNS ROAD  
GLEBE NSW 2037  
  
(02) 8746 5000  
INFO@WMRR.ASN.AU  
  
**WMRR.ASN.AU**

## Submission

Key consideration/question	WMRR's response
<p>Organic material is a major waste type that is disposed to landfill. Across Australia, an estimated 6.7 million tonnes of organic waste was sent to landfill in 2016-17.</p> <p>Q1 – Do you consider the draft strategy will provide the necessary framework to address the key problems resulting in organic waste being disposed to landfill?</p>	<p>In short, no, the strategy is inadequate and fails to develop a system for managing organic material in Queensland, that is, from production to consumption to avoidance and when this fails, back into circulation.</p> <p>WMRR finds that the draft strategy's current framework is insufficient to address the root causes of organic waste and in fact places too much emphasis on disposal in landfill.</p> <p>Firstly, the phrasing of this question suggests that organic waste is only problematic insofar as it is disposed of in landfills. This is not the case. Large volumes of organic waste produced in Queensland and around Australia are avoidable, wasting valuable primary resources and production efforts.</p> <p>To address the root causes of organic waste and, in connection, its disposal in landfills, the draft strategy's framework should have a stronger emphasis on avoidance actions. Landfill diversion pathways should be set up with the primary objective of avoidance in mind, and thus accommodate <i>residual</i> organic waste streams only. Such an avoidance preference would moreover align with the waste management hierarchy, which is listed as a guiding principle for managing organic materials under the draft strategy (p. 11).</p> <p>Secondly, while the draft strategy (p. 10) acknowledges organic waste as an entire supply chain issue, its focus on downstream retail-consumer food waste is inadequate. Food loss and waste generated across the supply chain cost the Australian economy \$20 billion per annum.<sup>1</sup> Focusing on downstream food waste alone, produced from retail through to consumption, leaves ~\$6.1 billion of losses unaddressed, based on food chain value loss mapping by the Fight Food Waste CRC.<sup>2</sup></p> <p>To support the Queensland government's long-term aspirations of a zero waste, circular economy, a holistic framework is</p>

<sup>1</sup> Lapidge, S 2015, 'Primary production food losses: turning losses into profit', *South Australian Research & Development Institute (SARDI)*,

[https://www.researchgate.net/publication/277558902\\_Primary\\_Production\\_Food\\_Losses\\_Turning\\_losses\\_into\\_profit](https://www.researchgate.net/publication/277558902_Primary_Production_Food_Losses_Turning_losses_into_profit).

<sup>2</sup> Fight Food Waste CRC 2021, *Value-chain food waste/losses in Australia: \$20 billion per annum*,

<https://fightfoodwastecrc.com.au/>.

	<p>required. Moreover, all stages of the supply chain must be targeted to achieve the draft strategy's full list of key objectives.</p>
<p>Queensland aims to reduce 25% of household waste by 2050. National targets for 2030 are to halve organic waste sent to landfill and global 2030 targets are to halve global food waste at the retail and consumer levels per capita and reduce food losses along the production and supply chains.</p> <p>Q2 – Do you consider the proposed actions will be effective in achieving the targets under the <i>National Waste Strategy</i> and <i>Queensland's Waste Management and Resource Recovery Strategy</i>?</p>	<p>WMRR is concerned that many of the proposed actions in the draft strategy have an overzealous focus on diverting organics from landfill through all manner of end-pipe processing solutions.</p> <p>Improved end-use management of residual organic materials is important and WMRR supports an integrated WARR system where clear pathways for sustainable material management and reuse, including through composting schemes, are developed. These, however, must be informed by decisions made at the start of the supply chain to maximise avoidance so that the risk of stranded assets is mitigated.</p> <p>If the framework of the draft strategy is adjusted to have a greater focus on avoidance, then WMRR believes that the strategy will stand a better chance overall at meeting the targets set out in the National Waste Strategy and Queensland Waste Management and Resource Recovery Strategy.</p> <p>Further, there remains far too few details on how Queensland will implement these actions, including the specific tasks, responsibilities, initiatives, funding and models that will be developed and rolled out, the milestones to meet, reporting and enforcement measures, and what will happen if these actions are not met within the specified timeframes. As it stands, the strategy is a high-level document that does not provide any guidance or clarity on how the supply chain can drive the department's organics objectives.</p>
<p>Four themes inform this Strategy: Education, Infrastructure and Services, Market and Product Development, and Data, Regulation and Enforcement.</p> <p>Q3 – Do you consider the proposed themes, timing and order of the actions are right?</p>	<p>WMRR considers the four (4) themes informing the draft strategy to be appropriate; however, the timing and focus of individual actions under each theme should be developed further and adjusted.</p> <p>Regarding theme (1) Education, some avoidance actions – for example under 1.01 and 1.02 – appear to reinvent the wheel, particularly when it comes to educational campaigns geared at fostering behavioural change to prevent avoidable food waste. The achievements of <a href="#">WRAP UK's Love Food, Hate Waste program</a>, for example, are well documented and offer ready-made solutions that can be deployed in Queensland sooner rather than later. Further the link with Queensland regulatory pathways to inform what is being educated on, is absent (e.g.,</p>

	<p>the link between what goes in the bin to reduce contamination and improving product quality).</p> <p>Secondly, in line with earlier feedback on Q2, the draft strategy should consider the impacts of waste avoidance in implementing the actions under themes (2) Infrastructure and Service and (3) Market and Product Development in the initial &lt; two (2) and two (2)- to five (5)-year stages of rollout.</p> <p>Further clarity is also sought on how these actions will be aligned to the state’s existing End of Waste framework and WARR infrastructure report, which maps out the gaps and opportunities in Queensland, as well as impending WARR infrastructure strategy, and funding initiatives that have been rolled out or are in the pipeline (e.g., the federal government’s Healthy Soils Fund). Publishing this strategy with no consideration of the ongoing or existing analysis of the state’s WARR infrastructure, needs, forthcoming funded projects, and other initiatives is a case of the tail wagging the dog.</p> <p>Greater thought should also be given to the suggested timeframes in increasing organics processing capacity in Queensland [2.06; currently slated to commence in three (3) to five (5) years]. If the strategy is informed by the WARR infrastructure report and other factors as noted above, and in light of the realistic timeframes in commissioning new infrastructure, then these timelines should be adjusted with work commencing within two (2) years so as to ensure Queensland has the appropriate processing capacity to manage its food and organic waste and meet its FOGO targets.</p> <p>WMRR would also caution against the use of compostable packaging in the collection and processing of organic materials without first undertaking an in-depth study into the true compostability (including impacts on the end product, length of time taken to compost, etc.) and potential contamination risks to the FOGO stream of these materials.</p> <p>A last recommendation on the action themes section is to improve the design of the table indicating the timing of actions to make it more legible. This could be done by putting a simple tick or cross in the column corresponding to the rollout stage that particular actions will apply to. WMRR has responded to these key considerations under the assumption that a white box indicates actions will <i>not</i> be happening</p>
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<p>Across the four themes, actions have been proposed for state and local government, industry and the community over the short, medium and long-term timeline.</p> <p>Q4 – Are there any actions missing that should be included?</p>	<p>WMRR recommends that greater emphasis and consideration needs to be placed on the regulatory framework - both the end of waste codes and the ERA framework applicable. These foundations must be set in order to attract investment certainty in Queensland. Further, not all organic output is the same, so this requires greater consideration in order to articulate what government expects - for example, high quality compost and mine rehabilitation attract very different investment scenarios.</p> <p>Given the importance of a food and organic (FOGO) service to households in Queensland and the impact that this will have on the amount to landfill and levy payments, which should be offset by the job creation and economic opportunities, it is vital that there is clear analysis and articulation as to the roles and responsibilities, as well as funding in order that this can be understood and benefits realistically achieved.</p> <p>In addition to actions to improving the policy and regulatory landscape for organics within Queensland, theme (4) Data, Regulation and Enforcement should have additional actions geared towards cooperation with other Australian jurisdictions. Such actions should focus on sharing data, information, and best practice for organics management, and be part of broader efforts to streamline waste and resource recovery (WARR) policy across Australia. Streamlining organics management across state, territory, local and federal governments will help identify and ameliorate potential regulatory roadblocks and inconsistencies that may, for example, reduce market opportunities for the sale of recycled organic materials created in Queensland.</p>
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